

16714  
**HYDROCARBON RECYCLERS, INC.**

**RECEIVED**  
**MAR 19 1990**

WICHITA FACILITY  
2549 N. New York St.  
Wichita, KS 67219  
TLX (316)267-8155  
OFFICE: (316)267-5742

Ans'd.....

CTA Environmental  
Attn: Doug Allen  
6180 Atlantic Blvd. Suite A  
Norcross, Ga 30071

3/12/90

Re:PCB contamination in Red River Wastestream Manifest #19099, Item 28c (see copy of manifest).

Dear Doug

Although I previously notified you of this situation by phone, this letter will provide the information with the supporting documentation.

Wastestreams coming to HRI are tested for PCB's only when they are suspected. This wastestream was not tested when it first came to this facility for this reason. The contamination was not discovered until a tanker load of waste was shipped to Systech Corporation in Fredonia, Ks. on 2/13/90 to be burned as cement kiln fuel. Systech regularly screens for PCB contamination. They assessed the PCB content to be 83 ppm (see Wastestream Variance Report from Systech), which is above the cutoff level of 50 ppm for PCB regulation under the Toxic Substance Control Act (TSCA). As the concentration stood it not only would have been necessary to incinerate the truckload, but also the rest of the 20,000 gallons in bulk storage at this facility from which the contaminated truckload was taken.

By understanding the nature of PCB's, the analytical procedures for them, and knowing that the screen performed by Systech is only for quick detection purposes, our lab in conjunction with a lab certified for PCB's was able to more accurately identify the specific PCB, Arochlor 1248. This resulted in a more accurate concentration level than the original value determined by Systech. The level for the transport tanker was 42 mg/kg (see Priority Analytical Laboratory analysis for waste solvent, tanker composite). We further tested the 20,000 gallon storage tank (V-5) at HRI from which the transport tanker was filled, and the PCB level was measured at 40.1 mg/kg (see Priority Analytical Laboratory analysis for waste solvent, V-5). These levels, because they are below the regulated concentration, does not require commercial incineration, but can be gradually blended by HRI into other kiln fuel being sent to Systech. The dilution is necessary due to Systech's own PCB level restrictions and not due to any regulatory restriction. This results in a major reduction in the potential disposal cost of the contaminated waste, but still requires



R00001632  
RCRA Records Center

additional care to see that the contaminated waste is diluted so that the resultant waste reaching Systech does not exceed their limits.

At this point it was necessary to locate the PCB contamination. This required screening the retain sample from each wastestream that was blended into the 20,000 gallon tank that could have caused the contamination (The list of wastestreams included in the contaminated storage tank is shown in the figure marked as such. Although there were more wastestreams present in the tank, the possibility of these contributing to the problem was eliminated by a PCB scan prior to the addition of the suspected wastestreams. This test proved negative). The Red River wastestream (Manifest# 19099 Item 28c, identified by lab code# 900704) was isolated as causing the contamination. The analytical information from our PCB, GC scanner is provided as follows:

- 1) Arochlor 1248 Standard used to screen the retain samples for this PCB.
- 2) PCB Scan of the retain sample of Red River manifest# 19099 Item 28c showing identical peaks to Arochlor 1248 Standard.
- 3) Typical PCB Scan of one of the contaminated tank component wastestream retain samples showing no PCB's.

The Red River wastestream retain (Manifest# 19099, Item 28c) showed the only PCB contamination of all the retain samples. This wastestream without a doubt caused the PCB contamination.

It is necessary to bill CTA for the rejected load freight, the investigation analytical, the certified lab analytical, and the additional labor involved to analyze and blend down the 20,000 gallons so that it can be burned as kiln fuel at Systech. The cost for this is \$2,500.00. This figure pales in comparison to the potential cost of incinerating 20,000 gallons of **regulated** PCB contaminated waste. Red River Army Depot in turn should not have any trouble paying CTA for this. It goes without saying that Red River should be notified so that they need to take steps to prevent this from occurring in the future.

If you have any questions concerning this situation please call me.

yours truly

*David Trombold*

David Trombold  
Sales Manager

cc Jim Gibson  
Jerry Smith

SYSTECH ENVIRONMENTAL CORPORATION  
P.O. Box 111, S. Cement Road  
Fredonia, KS 66736  
(316)378-4451

Date: 02/14/90

## WASTE STREAM VARIANCE REPORT

GENERATOR: HYDROCARBON RECYCLERS INC.  
2525 New York  
Wichita, KS 67219-4322  
Phone: (316)267-5742

Federal ID No: KSD007246846

HAULER: MATLACK INC.  
P.O. Box 1791  
WILMINGTON, DE 19899  
Phone: (800)628-5225

Federal ID No: DED981110166

Sample No.: CSI

Manifest No.: 91466

Nature of Waste Variance:

33 ppm PCB in load

Action Taken:

- . Load Rejected
- . Call Generator

SYSTECH Site Manager:

Paul J. Patten

Generator Called     

Visit     

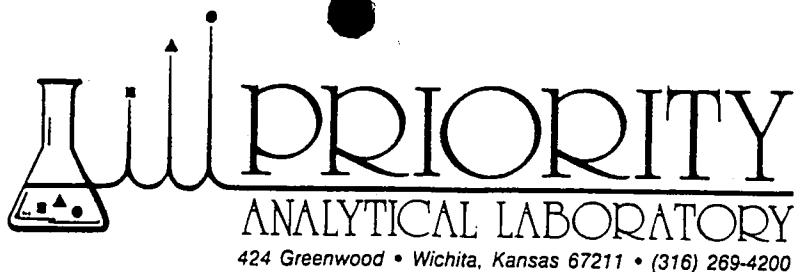
Sent Copy X

Resolution:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sales Representative:

Pol Long / J.T.



February 14, 1990

Hydrocarbon Recyclers, Inc.  
2525 New York  
Wichita, KS 67219

Attn: Steve Keiter, Laboratory Director

Sample I.D.: Waste solvent, V-5  
Date Submitted: 02/14/1990  
Lab #: 9006166

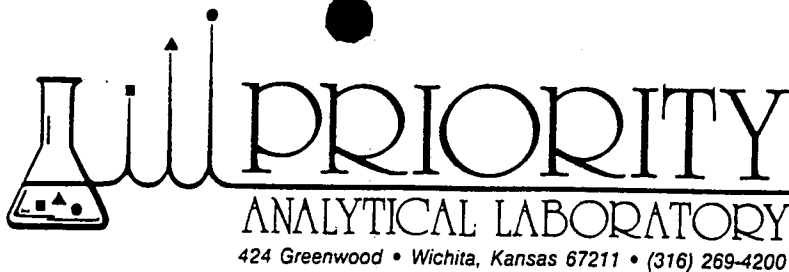
ANALYSIS

<u>Parameter</u>	<u>Amount</u>	<u>Units</u>
PCB (as Arochlor 1248)	40.1	mg/kg

Note: Sample solids included in results.

Respectfully submitted,

Randall Fornshell  
Lab Director/Chemist



February 14, 1990

Hydrocarbon Recyclers, Inc.  
2525 New York  
Wichita, KS 67219

Attn: Steve Keiter, Laboratory Director

Sample I.D.: Waste solvent, Tanker composite  
Date Submitted: 02/14/1990  
Lab #: 9006165

ANALYSIS

<u>Parameter</u>	<u>Amount</u>	<u>Units</u>
PCB (as Arochlor 1248)	42.1	mg/kg

Note: Sample solids included in results.

Respectfully submitted,

Randall Fornshell  
Lab Director/Chemist

1

PCB contaminated

HRI Tak. All

retain samples  
were screened.

for PICB's

DATE PROCESSED	return samples were screened for PCB's	COMPANY NAME	LAB CODE	WASTE STREAM	MANIFEST NUMBER	NUMBER OF DRUMS	COMMENTS
2/12/90	*	Red River	900718	W.F.L.	10009	1 of 1	Complete
"	*	Kansas Plating	900734	W. Paint Solids	00018	1 of 1	"
"	*	Kansas Plating	900733	W.P.R.M.	00018	6 of 6	"
"	*	VWR	900804	H.W.S.	00113	1 of 1	"
"	*	VWR	900802	W. Methylene Chloride	00113	1 of 1	"
"	*	Miller	900675	W.F.L.	00004	4 of 4	"
"	*	Grassy Mtn	900574	W.F.L. #21,22	90005	2 of 2	"
"	*	Grassy Mtn	900043	W.F.L. #62,63,64	89115	2 of 3	"
"	*	Grassy Mtn	900610	W.C.L. #66,67,68	90006	3 of 3	"
"	*	Mtn Home	900122	W.P.R.M. #918	39023	1 of 1	"
"	*	Red River	900704	H.W.L.	19099	1 of 1	"
"	*	Quik Print	900815	W.C.L.	00001	4 of 4	"
"	*	ASC - Neg.	900811	W.C.L.	00001	2 of 2	"
"	*	ASC - Neg.	900812	W. Used Oil	00001	3 of 3	"
"	*	Omega Cabinets	900805	W.F.L.	00002	2 of 2	incomplete

LIST WIDTH(4)  
ANALYSIS PARAMETER FILE 4

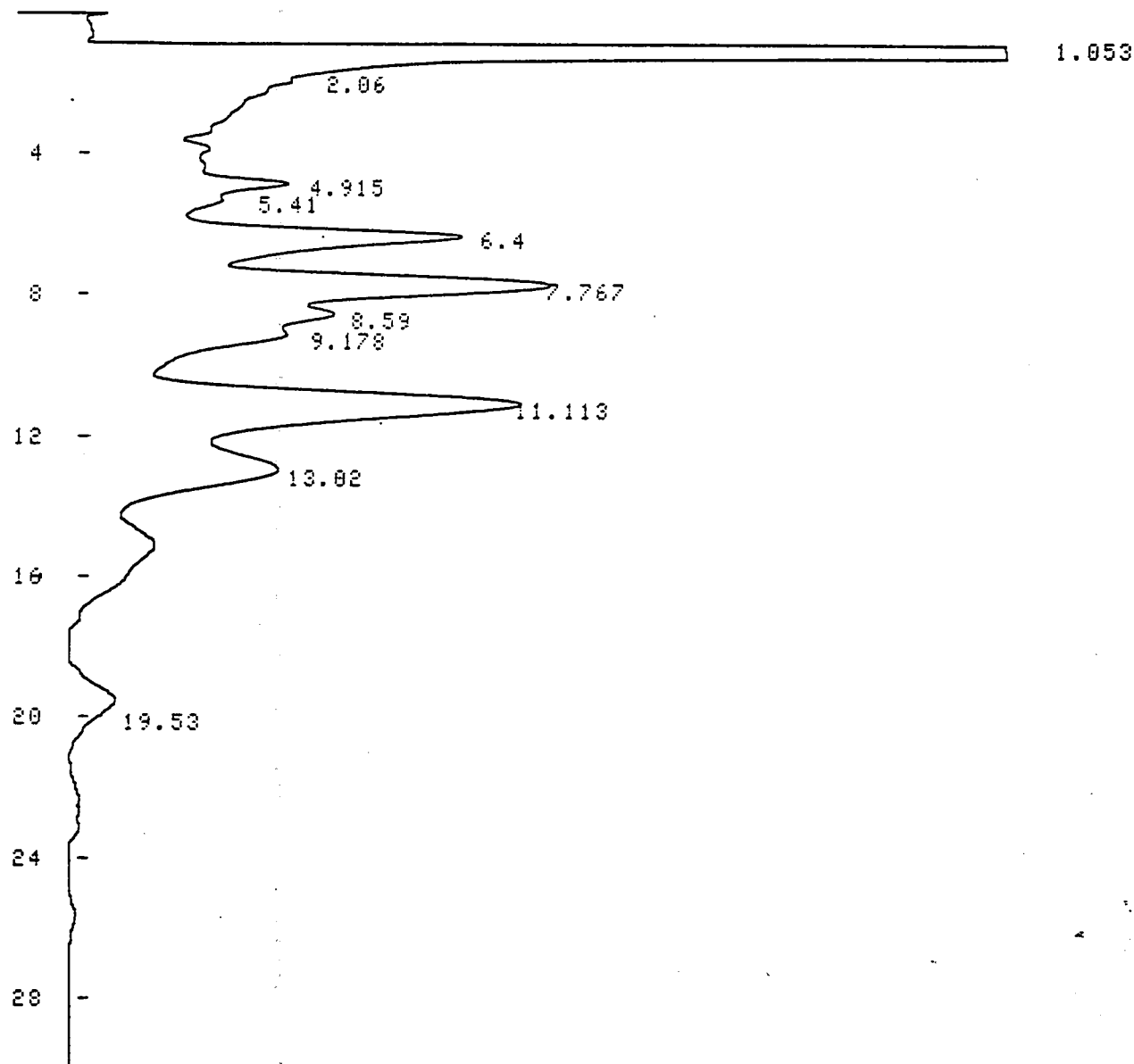
WIDTH 5  
DRIFT 0  
T.DBL 0  
ATTEN 5  
METHOD# 1441  
SPL.WT 100

AROCHLOR 1248 PCB Standard  
used to screen retain samples for  
this PCB.

SLOPE 6976.8  
MIN.AREA 0  
STOP.TM 30  
SPEED 5  
FORMAT# 1  
IS.WT 1

AROCHLOR 1248 .500G OF .1MG/1.0ML IN HEXANE

START  
ZERO



PKNO	TIME	HIGHT	MK	IDNO	CONC	NAME
1	1.053	<del>52671</del>	S		<del>89.9681</del>	
2	2.06	<del>326</del>	T		<del>0.0557</del>	
3	4.915	3171			0.5415	0.5
4	5.41	1006	V		0.1718	0.17
5	6.4	10116			1.7279	1.7
6	7.767	13623	V		2.3268	2.3
7	8.59	6047	V		1.0328	1.0
8	9.178	4460	V		0.7618	0.76
9	11.113	13464			2.2996	2.3

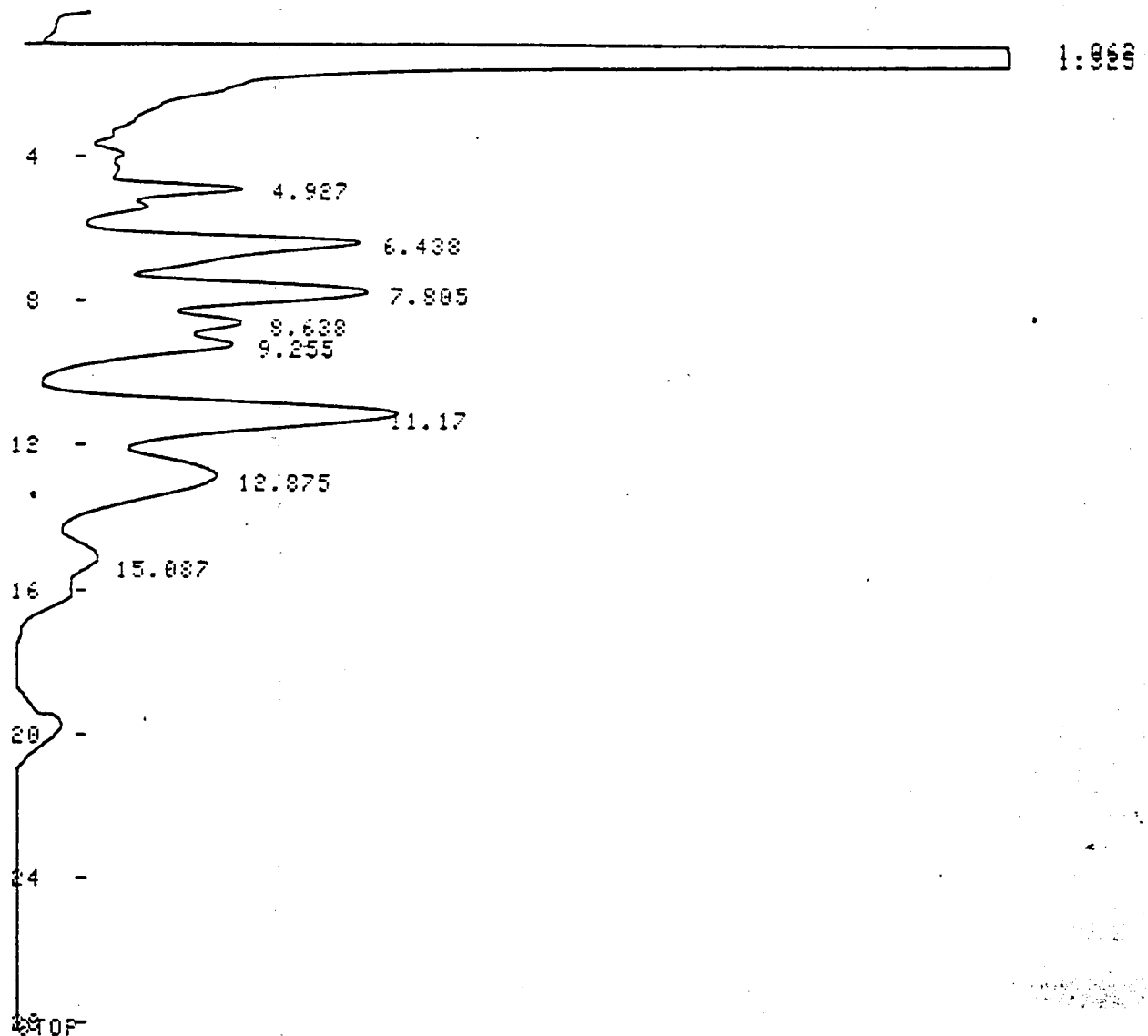
PCB scan of resin sample Red River  
manifest # 19099 Item 28c showing  
identical peaks to Arochlor 1248  
standard

LIST WIDTH(4)  
ANALYSIS PARAMETER FILE 4

WIDTH	5	SLOPE	6976.8
DRIFT	0	MIN.AREA	0
T.DBL	0	STOP.TM	30
ATTEN	5	SPEED	5
METHOD#	1444	FORMAT#	1
SPL.WT	100	IS.WT	1

#900704 1ML:99ML HEXANE 2-17-90

START



WARNING NO ID DATA



LIST WIDTH(4)  
ANALYSIS PARAMETER FILE 4

WIDTH 5  
DRIFT 0  
T.DBL 0  
ATTEN 5  
METHOD# 1441  
SPL.WT 100

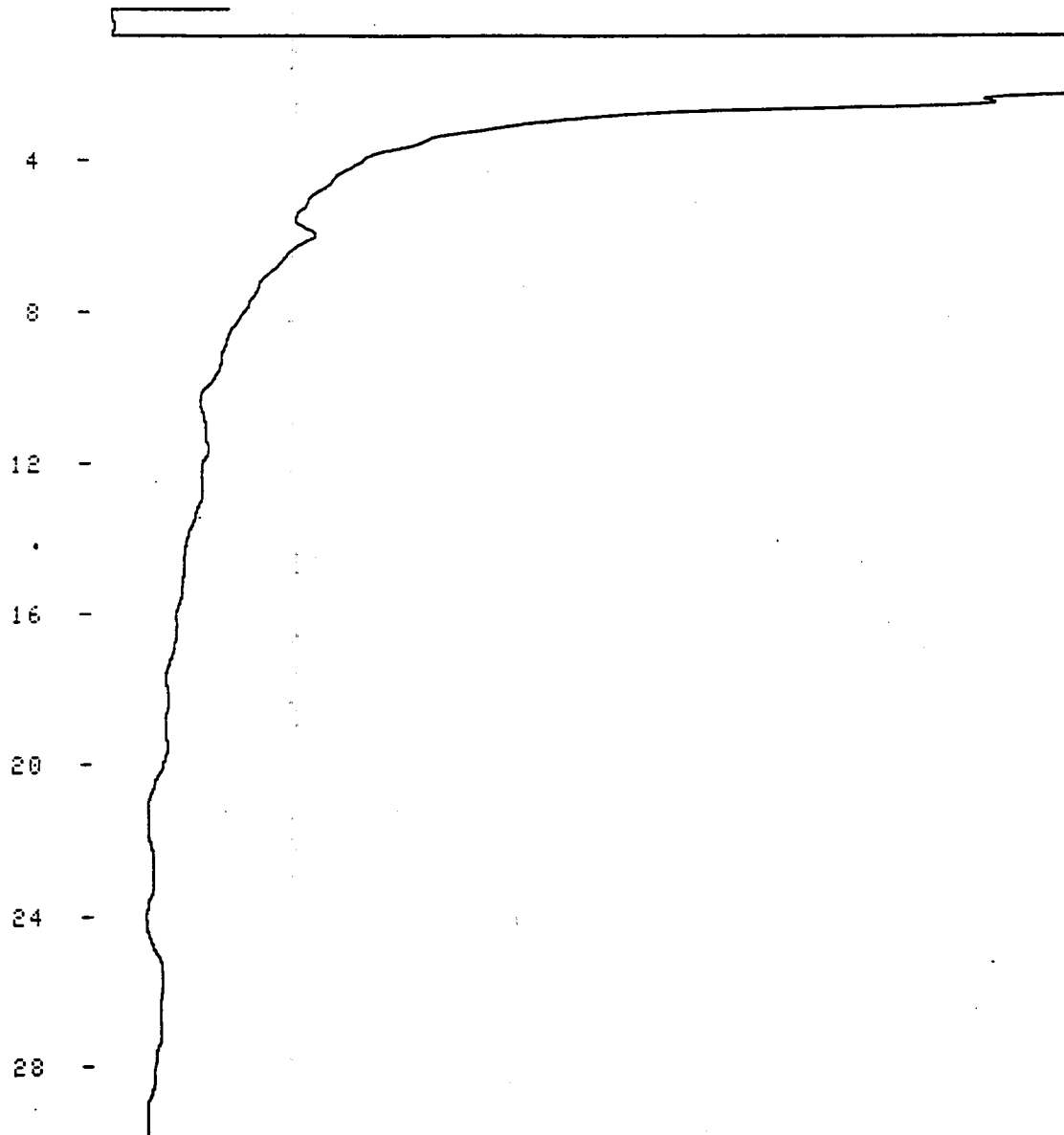
SLOPE 6976.8  
MIN.AREA 0  
STOP.TM 30  
SPEED 5  
FORMAT# 1  
IS.WT 1

Typical PCB scan of other wastestream  
retain samples showing no characteri-  
PCB peaks.

#900718 2-18-90

START

ZERO



WARNING NO PEAK

LIST WIDTH(4)  
ANALYSIS PARAMETER FILE 4

WIDTH

TEXAS WATER COMMISSION  
P.O. Box 13087, Capitol Station  
Austin, Texas 78711-3087



DLA 200 89 D 0068  
D # 0014

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address RED RIVER ARMY DEPOT ENVIRONMENTAL ACMT. DIV. BLDG 303 TEXARKANA, TX 75507-5000		TX 3-2-1-3-8-2-0-7-3-8-1-7-0-9-9		A. State Manifest Document Number No 00180981				
4. Generator's Phone (214) 334-2911		5. Transporter 1 Company Name USPC1		6. US EPA ID Number DKD-9-8-1-5-1-0-0-7-4		B. State Generator's ID TX S0178 OK F3225		
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID TX 40312		D. Transporter's Phone 405 324 5033		
9. Designated Facility Name and Site Address HYDROCARBON RECYCLERS INC 2549 NORTH NEW YORK ST. WICHITA KAN 67219		10. US EPA ID Number KES-D-0-0-7-2-4-6-8-4-6		E. State Transporter's ID		F. Transporter's Phone		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		
a. HAZARDOUS WASTE SOLID NOS ORM-E NA 9189 D008		No. Type		1565 P		Waste No. D008 TX990008		
b. Waste Corrosive Liquid NOS Corrosive material UN1760		002 DM		15 G		D002 TX990001		
c. HAZARDOUS WASTE SOLID NOS ORM-E NA9189 (D-007)		001 DM		428 P		D007 TX990007		
d. RG, HAZARDOUS WASTE SOLID NOS ORM-E NA9189 (D-008 D008)		001 DM		130 P		D008 TX990006		
J. Additional Descriptions for Materials Listed Above A) CLIN 3105 PR# 90688 Item# 0003 9157-3009 B) CLIN 4753 PR# 91578 Item# 0005 9157-3010 C) CLIN #1304 PR# 90636 Item# 0007 9177-0017 D) CLIN #2004 PR# 90691 Item# 0009 9177-0009		K. Handling Codes for Wastes Listed Above						
15. Special Handling Instructions and Additional Information DLA 200 89 D 0068 D # 0014 SEND COPY OF RECEIPT MANIFEST & CERTIFICATION TO: CTA ENVIRONMENTAL INC 380 N 200 W SUITE 203 BOUNTIFUL UT. 84010								
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
Printed/Typed Name LARRY D. BAKER DEBBI SMITH		Signature Larry D. Baker / Debbi Smith		Month Day Year 01/23/90				
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Billy Baxter		Signature Billy Baxter		Month Day Year 01/23/90		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.								
Printed/Typed Name RONALD K. ROBERTSON		Signature Ronald K. Robertson		Month Day Year 02/03/90				

DLA 20-89-D-0068-  
DO#0014

**UNIFORM HAZARDOUS  
WASTE MANIFEST**  
(Continuation Sheet)

21. Generator's US EPA ID No.

Manifest  
Document No.

22. Page

Information in the shaded areas is not  
required by Federal law.

23. Generator's Name

RED RIVER ARMY DEPOT ENVIRONMENTAL MGMT,  
DIV BLDG 303 TEXARKANA, TX 75507-5000

L. State Manifest Document Number

DD18 0981

M. State Generator's ID

TX50178 OK F3225

24. Transporter Company Name

USPC1

25. US EPA ID Number

12101981514474

N. State Transporter's ID

TX40312

26. Transporter Company Name

27. US EPA ID Number

O. Transporter's Phone 405 324 5000

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

29. Containers  
No Type

30. Total  
Quantity

31. Unit  
Wt/Vol

R  
Waste No.

a. HAZARDOUS WASTE SOLID N.O.S

ORM-E NA9189

002 DS  
001 DM

795 P  
756

05 P  
#

FOOS  
TX991005

b. ~~HAZARDOUS WASTE LIQUID N.O.S~~

~~ORM-E NA9189~~ RR

~~001 DM~~

~~RR~~  
~~54~~

~~6~~

~~FOOS~~  
~~TX991002~~

c. HAZARDOUS WASTE LIQUID N.O.S

ORM-E NA9189

001 DM

53

6

FOOS  
TX991003

d.

e.

f.

g.

h.

i.

S. Additional Descriptions for Materials Listed Above

A) CLIN# 4733 PR# 151250I Item# 21 9171-0108  
B) CLIN# 4705 PR# 291255K Item# 25 9177-0018  
C) CLIN# 4753 PR# 31250I Item# 53 9164-0010  
90029

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

34. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

35. Discrepancy Indication Space

28 b: NEVER SHIPPED per B. S. HARRIS - RR

TRANSPORTER # 1



SERVICE PROVIDED BY:

HYDROCARBON RECYCLERS, INC.

## INVOICE

Please Pay From This Invoice  
No Statement Will Be Rendered

SERVICE FOR:

RED RIVER ARMY DEPOT

RECEIVED  
APR 05 1990

000001

CUSTOMER NO.	INVOICE DATE	INVOICE NO.
1276	3/30/90	14423
REFERENCE NO.	LOAD DATE	
1939538	3/22/90	
BILL TO NO.	MANIFEST NO.	
1276	5115	
ACCOUNTING INFORMATION		
0000000 38		
P.O. NUMBER	TERMS	
	NET 30	

BILL TO:

CTA ENVIRONMENTAL INC.

6180 ATLANTIC BLVD

SUITE A

NORCROSS

GA 30071

NOTE: NEW REMIT TO ADDRESS

ITEM #	QUANTITY	DESCRIPTION	PRICE	PER	NET AM
LA	1.00	LAB ANALYSIS HANDLING, ANALYTICAL, AND DISPOSAL CHARGE FOR PCB CONTAMINATION OF 20,000 GALLONS OF KILN FUEL DUE TO PCB'S IN ITEM 280 OF RED RIVER ARMY DEPOT MANIFEST #19099	2500.000	EA	2500.00

APR 11 1990

REMIT TO: P.O. BOX 201831  
ADDRESS: HOUSTON, TX 77216-1831

Thank You

PLEASE PAY  
THIS AMOUNT

\$2,500.00